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cc MTC@mchsi.com, Karen Florini <KFlorini@environmentaldefense.org>, Richard Denison <rdenison@environmentaldefense.org>
bcc
Subject Environmental Defense comments on Hexaoxatricosane (CAS# 143-29-3)

(Submitted via Internet 2/15/05 to oppt.ncic@epa.gov, hvp.chemrtk@epa.gov, / boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and rcolau@rohmmaas.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for **Hexaoxatricosane (CAS# 143-29-3)**.

The Rohm and Hass Company, in response to EPA HPV Challenge, has submitted robust summaries and a test plan for hexaoxatricosane. According to the sponsor, hexaoxatricosane is produced by the sponsor and used as a plasticizer to increase the low-temperature flexibility of rubber products. It may also be used to increase the flexibility of "slightly scorched" [rubber] stocks. This submission provides a brief, but adequate, description of the production and uses of this chemical, as well a SIDS Initial Assessment Profile for hexaoxatricosane and background information regarding its safe handling and transport. Minor criticisms of the test plan would be to note that no other producers or uses, if any, are described and no estimate is given for possible leaching or other release of hexaoxatricosane from the products in which it is used.

Our review of this submission indicates that both the test plan and extensive robust summaries have been carefully prepared to summarize and describe studies addressing each of the SIDS elements requested by the HPV Challenge. In most cases data necessary to address the requested SIDS elements have been provided through recent studies designed according to OECD guidelines and conducted under GLP. In each case in which the necessary data were not provided through GLP studies, they were predicted through-EPA approved computer models.

A minor comment would be to note that organisms used in the studies of aquatic toxicity were probably not exposed to concentrations of the chemical as high as reported, because, according to the description of these studies "—there was a visible film on top of the water—". Nevertheless, all results of these studies indicate that hexaoxatricosane has relatively low toxicity to aquatic organisms. Similarly, it also has relatively low toxicity to mammals and does not appear to be genotoxic.

In summary, we find this to be an acceptable submission to the HPV Challenge. It is unfortunate that these apparently carefully conducted studies are taken almost exclusively from internal company documents and, as such, are not available to the public. However, that said, we should note that this is an excellent example of how the HPV Challenge in at least making summaries of such information available to the public.

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Thank you for this opportunity to comment.

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